

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

DAVID STEBBINS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10-3305-CV-S-RED
)	
RELIABLE HEAT & AIR, LLC, et al.,)	
And)	
)	
RANDALL RICHARDSON, et al.)	
)	
Defendants.)	

DEFENDANTS' RESPONSE TO PLAINTIFF'S

FIRST INTERROGATORIES

Come now Defendants Reliable Heat & Air, LLC and Randall Richardson, and respond to Plaintiff's First Interrogatories, as follows:

1. You claimed that I was fired for "numerous customer complaints about rudeness, abrasiveness, and arrogance." Please articulate the exact things I said to customers, that the customers complained about.

Response: Plaintiff's job duties were to answer the phone and take customer concerns and requests, commit such calls to writing and deal with customer's requests and needs including dispatching workmen to customer jobs. Several complaints were received by Defendants from customers concerning the manner in which Plaintiff handled customers on the phone. Although no exact details were related the complaints generally were that Plaintiff was rude and abrasive on the phone. One phone call was heard where Plaintiff informed a customer that he didn't know when we would be

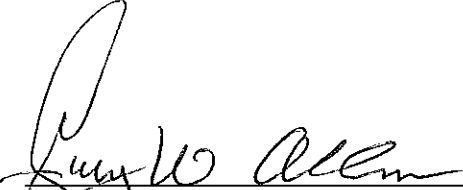
able to get to the problem for over a month. Plaintiff told Randall Richardson that that was just the way he was and customers would just have to get use to it. Plaintiff made no effort to correct his phone etiquette and his conduct was adversely affecting my business.

2. In the request for admissions, your client denied that he did not provide reasonable accommodations. This means that he believes he **did** provide reasonable accommodations. Please articulate, in detail, the reasonable accommodations he provided.

Response: Defendants offered Plaintiff alternate positions of employment working with the computer in the shop or cleaning and maintenance in the shop that would not require or involve interaction with customers but Plaintiff refused to accept or consider such accommodation. Plaintiff's response was that if it was too hot or too cold or if it was not clean he could not work there

3. You denied that my calculation of damages is accurate. Please articulate, in exquisite detail, the errors in my calculations.

Response: Object to this question on the grounds that it is overly broad, burdensome, vague and oppressive and further that it requests the legal theories and conclusions of party's counsel which are work product and privileged. Further, this interrogatory is merely an offer to engage in a debate concerning the issues of this case and inappropriately raised in interrogatory form.


Gary W. Allman
Missouri Bar No. 19921
P.O. Box 5049

Branson, Missouri 65615
Phone: (417) 332-2800
Fax No: (417) 332-1008
ATTORNEY FOR DEFENDANTS

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

DAVID STEBBINS,)	
)	
Plaintiff,)	
)	
v.)	Case No. 10-3305-CV-S-RED
)	
RELIABLE HEAT & AIR, LLC, et al.,)	
And)	
)	
RANDALL RICHARDSON, et al.)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

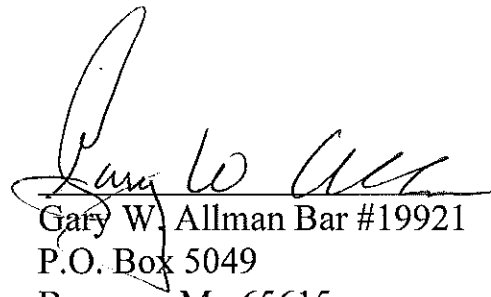
The undersigned hereby certifies that a true and correct copy of:

Defendants' Response to Plaintiff's First Interrogatories.

Was served upon:

David Stebbins
1407 N Spring Rd. Apt #5
Harrison, AR 72601
Email: stebbinsd@yahoo.com

() by delivering a copy to him;
() by leaving a copy at his office with his clerk;
() by leaving a copy at his office with an attorney associated with him;
(x) by mailing a copy to him, as prescribed by law;
(x) by transmitting a copy to them by email transmission at
stebbinsd@yahoo.com on the 5th day of January 2011..

A handwritten signature in black ink, appearing to read "Gary W. Allman", is written over the printed name and address.

Gary W. Allman Bar #19921

P.O. Box 5049

Branson, Mo 65615

Phone: (417) 332-2800

Fax: (417) 332-1008

garywallman@gmail.com

Attorney for: Defendants